



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

August 25, 2022

John L. Persico, P.G.
Geosyntec Consultants
1750 American Boulevard, Suite 200
Pennington, NJ 08534

Re: Rolling Knolls Landfill Superfund Site, Chatham, New Jersey

Dear Mr. Persico,

The Environmental Protection Agency (EPA) reviewed the groundwater sampling results for Per- and Polyfluoroalkyl Substances (PFAS) presented in the Technical Report- PFAS Results for Groundwater Sampling ("Report"), dated June 2022, submitted on behalf of the Rolling Knolls Landfill Group (Chevron Environmental Management Company, Nokia and Novartis Pharmaceutical Corporation). As you are aware, the results documented the presence of PFAS above New Jersey Groundwater Quality Standards and maximum contaminant levels in multiple samples. EPA submitted comments on the Report on June 28, 2022.

Based on the results, EPA requests that the Rolling Knolls Landfill Group submit a workplan to fully characterize and delineate the nature and extent of PFAS at the Site within 30 days of receipt of this letter. The workplan should be prepared in accordance with Paragraph 45 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation and Feasibility Study (ASAOC), II-CERCLA-02-2005-2034, and the relevant sections of EPA's "Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA" EPA/540/G-89/004 OSWER Directive 9355.3-01 (EPA, October 1988 or the most recent guidance), and should, at a minimum, address the following:

- 1) A historical document review that identifies areas of the Site where PFAS were most likely to have been used or disposed of;
- 2) An evaluation of the potential for impacts to off-Site receptors i.e. via impacts to potable water supply wells and residential wells;
- 3) Additional groundwater sampling from the entire existing groundwater monitoring well network and determination of new groundwater monitoring well locations to investigate the extent of PFAS migration off-Site. EPA strongly prefers the use of low-flow sampling for characterization and delineation of PFAS in groundwater;
- 4) Soil sampling at both the surface and the vadose zone, including the air/water interface just above the seasonal highwater table where PFAS tend to accumulate, to investigate the potential for PFAS soil contamination; and
- 5) Surface water, sediment and porewater sampling to investigate the potential impacts of PFAS contamination at the site on surface water bodies.

Note that completion of the above tasks will likely require close coordination with Fish and Wildlife Service (FWS), particularly since most if not all the new off-Site samples will be located on FWS property. EPA does intend to send FWS a separate letter requesting its participation with this effort.

This additional information will support EPA's review of remedial alternatives and selection of a protective remedy for the Rolling Knolls Landfill Superfund Site. Consistent with Paragraph 45 of the ASAOC, please confirm the Rolling Knolls Landfill Group's willingness to perform the additional work within 7 days of receipt of this letter.

If you have any questions, please contact Rupika Ketu at 212-637-3258 or ketu.rupika@epa.gov.

Sincerely,

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KETU



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Rupika Ketu
Project Manager

Cc: Richard Ricci, Esq.
Jill McKenzie, NJDEP
George Molnar, FWS